

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v- :
:

DARRYL HARRIS,
a/k/a "Darrell Harris,"

Defendant.

----- x

COUNT ONE

The Grand Jury charges:

1. In or about October 2007, in the Southern District of New York, and elsewhere, DARRYL HARRIS, a/k/a "Darrell Harris," the defendant, and others known and unknown, unlawfully, willfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, violations of Title 18, United States Code, Sections 2113(a) and (d).

Objects of the Conspiracy

2. It was a part and an object of the conspiracy that DARRYL HARRIS, a/k/a "Darrell Harris," the defendant, and others known and unknown, unlawfully, willfully and knowingly, by force and violence, and by intimidation, would and did take from the persons and presence of others, property and money belonging to and in the care, custody, control, management, and possession of a bank, the deposits of each of which were then insured by the

ORIGINAL

INDICTMENT

07

07 CRIM. 1134



Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

3. It was further a part and an object of the conspiracy that DARRYL HARRIS, a/k/a "Darrell Harris," the defendant, and others known and unknown, while committing a bank robbery unlawfully, willfully and knowingly would and did assault persons and put in jeopardy the lives of such persons by the use of a dangerous weapon, in violation of Title 18, United States Code, Section 2113(d).

Overt Acts

4. In furtherance of the conspiracy, and to effect the illegal objects thereof, the following overt act, among others, was committed in the Southern District of New York:

a. On or about October 11, 2007, DARRYL HARRIS, a/k/a "Darrell Harris," the defendant, robbed the JP Morgan Chase Bank at 875 Saw Mill River Road, Ardsley, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

5. On or about October 11, 2007, in the Southern District of New York, DARRYL HARRIS, a/k/a "Darrell Harris," the defendant, unlawfully, willfully, and knowingly, by force and violence, and by intimidation, took from the persons and presence of others, property and money belonging to and in the care, custody, control, management, and possession of the JP Morgan Chase Bank, 875 Saw Mill River Road, Ardsley, New York, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), and in committing such offense, DARRYL HARRIS, a/k/a "Darrell Harris," the defendant, did assault and put in jeopardy the life of another person by the use of a dangerous weapon.

(Title 18, United States Code, Sections 2113(a) and (d) & 2.)

Ingrid R. Garcia
FOREPERSON

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MICHAEL J. GARCIA
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